



COPRECI GROUP CODE OF CONDUCT

.....
DOING BUSINESS THE RIGHT WAY

We care for our customers
and our world



1. INTRODUCTION

A STRONG COMMITMENT
WITH THE LAW

1.1 Aim

The objective of this Code of Conduct (hereinafter referred to as “Code”) is to remind all employees, members of the statutory boards of auditors (hereinafter referred to as “Relevant persons”), customers, suppliers and public & private institutions (hereinafter referred to as “third parties”) of Copreci Group, of the strong commitment of Copreci S.Coop to the full compliance with the applicable laws and regulations of the countries in which the Group operate, or if a local legal requirement is not as strict as the requirement included in this Code, to follow the requirement in this Code.

EDITION	APPROVAL DATE	APPLICATION DATE	REMARK
1	08/05/08	08/05/08	Approval of code of conduct
2	09/01/14	09/01/14	Incorporation section “ 3.3 Corruption and Bribery”
3	15/05/15	15/05/15	Incorporation section “3.4 Communication misconduct” and section “5.10 Forced and bonded labour”
4	21/09/16	21/09/16	Modifications in sections 2.1, 2.2., 2.4, 2.5 Removal of section 2.6 (contractual value of the code for consultants and suppliers) Modification in sections 3.1, 3.2, 3.3.1, 4.1, 5.12. Introduction of new section 5.15 (Safe, clean and healthy working place) Modification in section 8.1. y 10 (Suppliers pre- assessment) and removal of sections 10.1, 10.2 y 10.3
5	06/11/2017	06/11/2017	Modification in section 3.3.2: add up a paragraph (Protocol of action against harassment) Modification, in section 3.4, of the e-mail address and add up a paragraph (Confidentiality guarantee)
6	03/11/2021	03/11/2021	Copreci plant list updated on last page
7	11/04/2024	11/04/2024	Add 4.4. Free Competition and Fair Competition chapter
DONE BY			REVISÉ BY
HUMAN RESOURCES CORPORATIVE			HHRR DIRECTOR
			APPROVED BY
			“COMITÉ PROCESOS”

1.2 Professional Secrecy

This document and all of its activities are dependent upon cooperation, mutual trust, respect and confidential treatment of all observations, discussions and written information between third parties and all relevant person appointed by Copreci Group.

2. CAMPO DE APLICACIÓN

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FROM SEVEN COUNTRIES WE
REACH THE WHOLE WORLD

2.1 People to whom the Code applies

This Code is aimed at and is binding for all Copreci Group companies persons, or anyone acting in the name and/or on behalf of any Copreci company.
This Code applies to all facilities involved in the production of products and components for Copreci Group.

2.2 Control body in charge of monitoring

Monitoring compliance with the Code is the responsibility of a specific control body called "Comité de Procesos", whose tasks include:

- a) Ensuring that the Code is properly communicated to all relevant Copreci persons and anyone else to whom it might be of interest
- b) Review the Code
- c) Keeping the information given, totally confidential

2.3 Communication of the Code

This code will be communicated to all the Copreci Group employees through the Welcome Handbook. This handbook must determine that it is compulsory to read and fulfil this code.

Every time that there are important changes or the Process Committee considers appropriate, the necessary communication will be made following these guidelines:





2.3.1 Copreci Aretxabaleta

	TASK	CHANNEL	RESPONSIBLE
1	Communication to Board Members	Board Members meetings	Director
2	Communication to Social Board and to Supervisory Commission	Social Board meetings	President
3	Communication to all the people	Social meetings	Social Board vocal

2.3.2 Subsidiaries

	TASK	CHANNEL	RESPONSIBLE
1	Communication to Plant's Director	Operational meeting	HR Director
2	Communication to Directos and Department's heads	Collaborator's meeting	Plant's Director
3	Communication to all the people	Consejos	Department's Head

2.3.3. Third parties

	TASK	CHANNEL	RESPONSIBLE
1	Communication to suppliers	General criteria	Purchase head
2	Communication to consultants and auditors	Operational meeting	Contact's responsible

2.3.4 Internet & Intranet

A copy of this Code can be found on the Internet site of Copreci Group, as well as on the Intranet.

2.4 Commitment for employees

All employees are required to read the Code and to behave in accordance with the principles and prescriptions contained within it.

2.5 Commitment for directors, board members

Complying with the Code is part of the duties of directors and board members.

3. GENERAL RULES OF CONDUCT

FULL COMPLIANCE WITH ALL
LEGISLATION



3.1 Registration and factory license

The Copreci Group and third parties should have a business license to operate, and to fulfil with their terms.

3.2 General principle: full compliance with all legislation

While carrying out their professional duties on behalf of any Copreci company, every relevant Copreci person and third party must be aware and comply with the law of the country in which they live and normally work and those of all the countries in which they occasionally work. Furthermore, they will give dignified and respectful treatment to their employees.

Any relevant Copreci person or third parties who is forced or instigated into not complying with the law, must immediately report this issue to their manager, or the HHRR Corporate Director.

3.3 Corruption and Bribery

It is strictly forbidden to receive or to offer any form of gift which could be regarded as having a value higher than could be expected out of normal courtesy, or with a view to obtaining personal favourable treatment or a favourable treatment for any Copreci Group company.

Any Copreci company cannot finance political parties, public organizations or political candidates.

It is also strictly forbidden to use any public funds or loans without Financial Department favourable authorisation.

3.3.1 Working with third parties

When dealing with third parties every relevant Copreci person must ensure that they ask suppliers to sign a form confirming that they have read this Code and that they agree to be bound by the rules contained in it. Or, otherwise, that they have their own certification in Social Responsibility or has its own code of conduct.

3.3.2 Prevention and monitoring

In all the factories of Copreci Group there are mailboxes to collect reports of bribery, corruption, abuses, discrimination, etc.

Additionally, Copreci S.Coop, has established an specific procedure, "Protocol of action against moral or gender-based harassment", in which is explained what it is understood as moral or gender-based harassment, which are the preventive measures Copreci is taking in order to avoid them and what steps should be followed if anyone detects a situation.

The Board of Directors is responsible to enforce this code of conduct. They have monthly meetings to monitoring the management.

3.4 Communication misconduct

Anyone observing malpractice of this Code of Conduct can report to their boss or the Corporate HR through the following email address: **socialresponsibility@copreci.es**.

Copreci guarantees that all the claims will be handled with strict confidentiality.

4. RECORDING OF TRANSACTIONS AND GENERAL CONTROL FRAMEWORK

IN COMPLIANCE
WITH THE LAW

4.1 General principle: full compliance with all legislation

Every transaction which is carried out in the interest of any Copreci Group company must be fully compliant with the local legislation in force.

4.2 Authorization and back-up documentation of transactions

All transactions must be properly recorded in the accounting system.

There should be an adequate back-up documentation, which could be used, at any time, to confirm the nature to identify the individuals, who have authorised, carried out, recorded and checked the transaction.

4.3 Cooperation with control bodies

All the information given to anyone with a role in the internal control and auditing system of any of the Copreci companies must be accurate and true. Any information that has to be given to or registered with public authorities needs to be timely, accurate, made by the appropriate persons and in compliance with the law.

4.4 Free Competition and Fair Competition

We undertake to comply rigorously with antitrust legislation and to compete fairly in the markets, promoting free competition and complying, at all times, with the regulations in force. For this reason, the Copreci Group will not participate in conversations, agreements, arrangements, projects or alliances with current or potential competitors regarding prices, commercial conditions, offers, market sharing or any other activity that restricts or could restrict free competition.



5.HUMAN RESOURCES

COMMITMENT TO PEOPLE



5.1 General principle:

Copreci Group recognises the fundamental principles of Human Rights, as defined by the “Universal Declaration of Human Rights” (United Nations 1948).

5.2 Contracts: full compliance with all legislation

The employees and third parties of Copreci Group shall be employed according to applicable laws and regulations and there shall be a contract (or appointment letter) written accordingly.

5.3 Payrolls

The Copreci Group and third parties shall maintain payroll and working hours for each employee, including temporary workers.

5.4 Working hours and overtime

The Copreci Group and third parties employees working time must not exceed the legal limit.

5.5 Regular payments

The Copreci Group and third parties shall pay its employees with no less than the legal applicable minimum wage. The minimum wage shall be paid as per local legal demands (based on legally stipulated standard working hours).

Wages shall be paid at regular intervals and on time with respect to work performed, according to local legislation

5.6 Overtime pay

The Copreci Group and third parties employees shall be compensated for all overtime hours worked according to the legal requirements.

5.7 Leaves

The Copreci Group and third parties employees shall have time off from their job according to applicable legislation, local traditions and standards (e.g. sick/medical leave, annual/earned leave, maternity leave, national holidays etc.).

5.8 Benefits

The Copreci Group and third parties shall provide its employees with all legally mandated benefits to which they are entitled (these could be: medical insurance, social insurance, pensions etc).

5.9 Requirements for housing

If there is legislation within this area, the Copreci Group and third parties shall comply with legal requirements.

5.10 Child labour

The Copreci Group and third parties shall not make use of child labour ⁽¹⁾ and maintain a Labour force register including date of birth for all the workers.

When a child is detected in our factories, the HR Department will finalize the contract and they will analyse the causes and they will implement appropriate corrective and preventive actions.

Note 1: According to ILO Minimum Age Convention no. 138 (1973), a child is defined as any person less than fifteen years of age, unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age would apply. National laws or regulations may permit the employment or work of persons 13 to 15 years of age or 12 to 14 years of age on light work which is:

- a) Not likely to be harmful to their health or development; and*
- b) Not such as to prejudice their attendance at school or training programme*

5.11 Forced & Bonded labour (Start-up requirement)

The Copreci Group and the third parties shall not make use of:

- forced⁽¹⁾
- prisoners⁽²⁾ against their wishes
- indentured or involuntary labour.

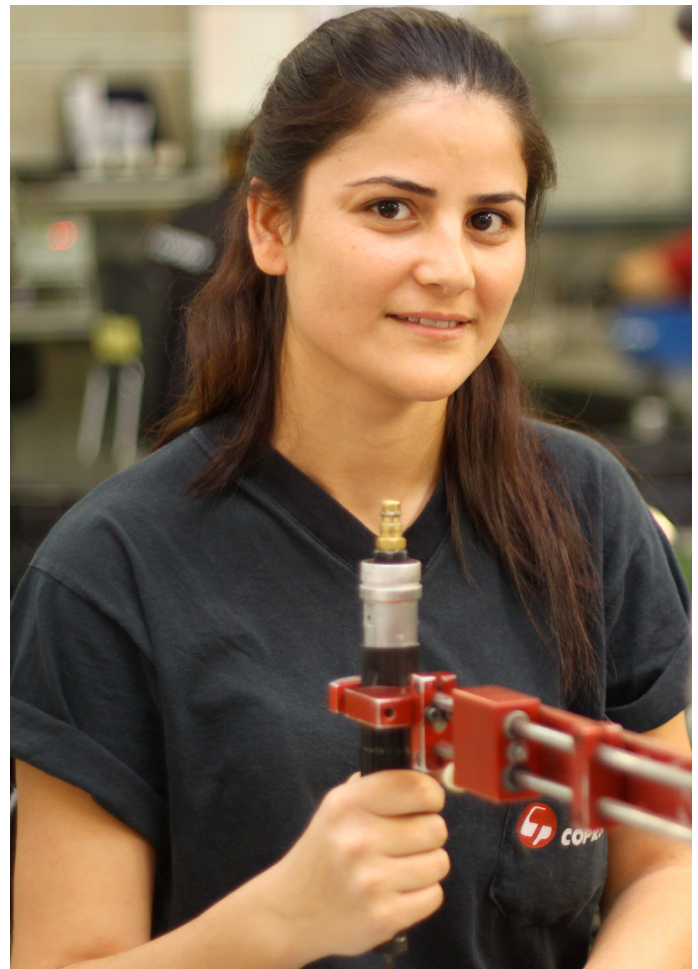
Note 1: Forced labour is understood as all work or service that a person is compelled to carry out under any threat of punishment or confiscation of any personal belongings, such as ID card, passport etc., and for which work the said person has not offered him/herself voluntarily.

Note 2: Use of state or military prisoners at the supplier is prohibited.

5.12 Discrimination

Copreci Group recognizes the cultural differences and different standards that applies in each country. The employment conditions must obey to the individual profile to fulfil the position, never to personal characteristics or beliefs.

Therefore, Copreci Group will never discriminate in hiring processes, retribution, benefits, promotion,



discipline and ending contracts on the basis of race, religion, gender, civil status, age, political affiliation, birthplace, sexual orientation or any other reason prohibited by law.

5.13 Labour union

The Copreci Group and third parties shall ensure that employees are not prevented from associating freely.

5.14 Collective bargaining

The Copreci Group and third parties shall not prevent employees from exercising collective bargaining⁽¹⁾.

Note 1: Collective bargaining is defined as negotiations between employer and employee representatives (freely and independently chosen by the employees).

5.15 Safe, clean and healthy working place

Copreci Group will provide its employees and workers a safe, clean and healthy working place, in compliance with the applicable laws; it will assure, at least, the access to safe water, sanitary facilities, fire-fighting equipment, medical facilities, emergency exits, safety equipment and appropriate ventilation and lighting.

6. ENVIRONMENT – Air, Noise, Water, Ground pollution, Chemicals and Waste

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COMMITMENT TO
ENVIRONMENT



6.1 General principle

The Copreci Group and their third parties shall have a valid environmental classification and comply with requirements stated in the classification. Particularly:

- Air pollution
- Noise pollution
- Water pollution
- Ground contamination
- Chemicals
- Hazardous and Non-Hazardous Waste

6.2 Requirements

The Copreci Group and their third parties shall ensure compliance with:

- Inspections by environmental authorities: ensure compliance with the results from inspections by environmental authorities. The required corrective actions must be documented and completed in stipulated time.

6.3 Continuous Improvements:

The Copreci Group and their third parties shall ensure and demonstrate continuous improvements in various areas aiming at:

- Emissions to air
- Discharges to ground and water
- Noise
- Hazardous and non-hazardous waste
- The use of natural resources e.g. energy, raw materials, chemicals etc., as well as working to reduce and replace the use of fossil fuels
- The supplier shall also continuously work to replace hazardous substances with less hazardous



7. WORKER HEALTH & SAFETY

OUR PEOPLE, OUR PRIORITY

7.1 General principle

The Copreci Group and their third parties shall comply with Worker Health & Safety requirements stated in the classification.

- Fire prevention
- Accidents and incidents
- Health & Safety training
- Machine safety devices
- Safety instructions
- Selection and Use of personnel protective equipment
- First aid equipment and trained people

7.2 Requirements

The Copreci Group and their third parties shall ensure compliance with:

- Inspections by environmental authorities: ensure compliance with the results from inspections by environmental authorities. The required corrective actions must be documented and completed in stipulated time.

7.3 Continuous Improvements:

The Copreci Group and their third parties shall ensure and demonstrate continuous health and safety improvements in various areas aiming at:

- Reducing the number of incidents and accidents
- Increasing workers involvement in improving their working environment

8. CONFIDENTIALITY

TRUST OUR PEOPLE

8.1 General principle

All relevant Copreci persons have an obligation to make sure that all the sensitive information with which they come across while performing their duties is treated with the appropriate level of confidentiality, both within and outside the working environment.

All Copreci companies are committed to protecting the information regarding to their employees or third par-

ties, in compliance with the applicable Data Protection legislation.

Any relevant Copreci person receiving a request of confidential information from third parties should never, directly or indirectly, give that information but should instead forward the request to their responsible.

9. SANCTIONS FOR NON-COMPLIANCE WITH THE CODE

9.1 Sanctions

If employees do not comply with any prescription of this Code they will be subject to a sanction that vary according to the degree of non-compliance and which will be consistent with the company internal rules.

FOR A BETTER
PERFORMANCE

10. CODE OF CONTACT ATTACHMENTS TO THE SUPPLIER APPROVAL PROCESS

In the supplier pre-assessment document it is asked for the Quality, Environment, Health& Safety and Social Responsibility certifications.

In case de supplier it is not qualified in any Social Responsibility standard, it can attach its own code of conduct or commit to fulfil this one.

OUR SUPPLIERS,
OUR COLLABORATORS



TO BE FULFILLED BY THE SUPPLIER



From:
(supplier name)

To: COPRECI GROUP

Date:

☒ We do confirm the full compliance with the Copreci Group Code of Conduct.

Signature of the responsible person:

Name:

Position:

Signature:

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